

In the United States district Court

Northern district of Illinois, eastern division)
Zsoch Dunn)no.-17-c656

PLAINTIFF,)Hon pallmeyer
)now
)mag H.S.Cox
) Judge A Wood
) Jury demand

Vs.

P.o.5211
P.o.5317
P.o.5313
P.o.5329
P.o 5333
Denault
City of LaSalle
Dr.David KELton
LaSalle COUNTY
Individually
DEFENDANTS.
)

MOTION to reconsider and vacate

the unconstitutional orders in all

motions that were denied
PrejudicialLY,manifested all the
RELIEF SOUGHT by the
PETITIONER/ PLAINTIFF, z d u n n (8f)civcodeprocedures{reopen
COUPLED 'MOTION,TO DO Discovery WITH-Limitations, oral arguments in:{ glucksburg,
Maryland.,violations}

PLAINTIFF,ZSOCH DUNN has moved by and through this motion for a rehearing,opening of
Discovery requests in Maryland, JCKSBERG,) my rights to depose the defendants before trial on the
against the defendants All police officers maniki, b u f f o, pines
defendants individually,,ET..AL.,}

2) the defendants have destroyed evidence of wrongdoing that they have committed in violation of the
US Constitution 4th amendment, article 1 section 6, the Bill of Rights, the fourteenth amendment
protections that were reported to the plaintiff at the time of the arrest.

3) the overheightened and pleading requirement retroactively applied cannot be used or granted as relief
to prejudice me,Mr Dunn,the judge under investigation,(with corruption at the judicial 27th floor) whom
has shielding the' timely made reports against wood A. the judge who has given unconstitutional varying,
adverse continuances and delays, which have caused implemented prohibited harm to the plaintiff{ d u n
n, Zsoch } Congress has under the 4th amendment banned and not given authority,the judges
manifested PREJUDICIAL ,dishonest denying motions by both Maria Valdez subj,to ice},whom sent me
Glen bowdens criminal, papers and files carelessly as she was illegally practicing law,before judge Cox
arrived,thee,judical canons eviscerations and hostilities by the transcriptionist have eroded fairness in
deposing,or any success with lawyers for the defendants UNLAWFULLY conspiring behind
the plaintiff}in non-disclosed-meetings regarding this litigation} tampering of my
filings,documents,evidentiary,gave unfairness to spoilers of evidence that was critical evidence of thee
"face-down handcuffed Violent battery by all cops involved,sheriff's,and dr.kelton,and also supcrt)219-

violations under a CERTIORARI review, now for Dr KELTON and all counts to be placed back into the lawsuit vs the DEFENDANTS, this deposing seeks to redress by these rights being requested, commanded to be given.

4) any determinations by the new receiving the file which equals the practice of law and arbitrating, mediating by h. judge cox's any findings should be deferred the plaintiff tenders into a trial the Plaintiff lawsuit survives the Constitutional muster.

5) play the moves this court is in 2 G dissolve all orders of February 2nd 2019 to the present as in because on January 14th 2020 the judge would improperly served me correspondence that was not pursuant to the rule 14 USPS Etc and it was more than a year old Harmony and prejudice and me within the proceedings to the present my reconsiderations in appeals and even motions routine motions were denied by her and her prejudice threatening Magistrate Judge Valdez and they granted favorite show fanciful arbitrary answers and unlawful arbitrating to the defendants who wantonly, after written by correspondence by Edward Johnson third attorney and , instructing them not to destroy, employees destroyed evidence) even threatening the PLAINTIFF during Shiloh, all alone unlawful determination proceedings fraudulent hearings setups where I was assaulted and threatened even before entering the court, and by Court staff under cjc(61-64 Canon standards).

6) these rulers take place as I am stalked by my previous hospital in police officers just about everywhere I go through photographs in reports to prove it and no belief thereof, the White descendants , a non-white judge female and non male threatenors at the federal UNINCOR FACILITY building actions had adversely affected a third parties interest in the litigation Medicare Section 1395) and the interest rates, of mr. Dunn, interest for the inflicted bodily harms they gave , intentionally caused meeting proximate causation, with documentation what's to be inferred is clear and evident.

7) the same judge who appointed me a little DISPICABLE attorney old racist, stated": and I'm going to appoint you a lawyer that you're not going to like very much ""*and quote"" is the same judge who while I was in jail as the plaintiff was in jail being badgered and threatened by the LaSalle police and the judge she was dismissing Core counts against me in favor of evidence destroyer's and then upon my return to her court she threatened, choleric and intimidated, badgered, Plaintiff and denied all timely relief sought and did nothing to bring her courtroom into repute, and interrupted this legal process by frustration,, ACCOMMODATED their trial calls, and her ineffective trial handling taking it out on mr. Dunn.

8) the standard of BERGER, COMMON LAW, CANONS HAVE BEEN EVISCERATED AS JUDGE WOODS collaboration with the effects TO FURTHER, disadvantage to the plaintiff DUNN INJURED BY NEW INJURIES, THAT DON'T INTERJECT THESE INJURIES OF (2016) BIAS HAS caused the plaintiff a repositioning and writer's block due to the discrimination based on :disability origin and race, age, religion having that's engaged and reports and judicial first amendment protections complaining of civil rights to privations against the judge and other staff who are federal workers also {see U.S.C section-28\$-U.S.C-1343<, U.S.C.-42-1983) ALLEGING Federal statutory and constitutional state violations against the plaintiff specifically and privileges of SECURED rights to have a trial security in the United States under the constitution in matters of controversy of \$20 or more , FACTUALLY THIS judge has eviscerated these rights and abused the plaintiff materially while working for the entity the federal court northern district courthouse of Illinois in her private capacities in favor of tortfeasors, A JURY WILL RECEIVE ADVERSE INSTRUCTIONS AND GRANT RELIEF, MONETARY JUDGMENT OPPOSE TO WHAT'S BEING TECHNICAL ADVICE TO THE UNREPRESENTED PLAINTIFF DURING ALL COURT APPEARANCES.

9) the denials, of the timely made motions have caused undue work and a burden on the plaintiff which equals the unauthorized practice of law being carried out by a judge on this case, and the spoliation of evidence party has already COMMITTED THREE upMOST offense and it is fatal to there motions for any relief summary judgment excetera absent prejudice manifested by judge wood who has a "double role" and is doing things for a COMPENSATORY , oral payment in exchange for helping employees who are engaged and HAVE ENGAGED IN unlawful activities on(February 2nd to February 3rd 2016) even to the present day by where the plaintiff ZDUNN suffers as a result I tore a rotator cuff multiple spinal, cervical, nightmares, brain, tissue ligature wrist, lower lumbar, ankle and other extremity pains as a result of what the LaSalle police did on February 2nd 2016 in Illinois also see Lombardo THERES NO immunity

10) Illinois law provides the public entities are directed to pay any judgment for compensatory damages for which employees are allowable within the scope of their activities and employment 745 ilcs is 10 / 9 - 102 by the city of LaSalle LaSalle county LaSalle Police Department in LaSalle sheriff's Department in care of the abuser Thomas P TEMPLETON in evidence destroyer

11) WHEREFORE, PLAINTIFF, ZSOCH DUNN play SPECIFICALLY request that this Honorable I COURT enter an order granting judgment to vacate previous orders that were entered with respects to harming and that led to a prohibited prejudice against the PLAINTIFF ZDUNN, and allow the dilenianation and the correction in the amendments of any clarity in any of the motions are filed as that have been typed and numbered and submitted sENT from the postal and care of the defendants by which the plaintiff SEEKSs judgment against, police officer LaSalle's police city of LaSalle 5211, 5329, 5317, 5330, 5313, deputy denault, David kelton, valley now Christ HOSPITAL switching names during litigation, all I know individually and officially ,KNOWN police OFFICERS, the city of LaSalle, LaSalle county Thomas Templeton, head Warden abuser Retaliator before pre pLEA' before trial U.S.C- 12203 I pray all relief and vacation of the orders will be granted.

Zdunn

2693369124

Chicago il

Prose,vet,8f,civcodeprocedfederal.

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FEB 25 2020 *By*
2-25-20

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
ZDUNN)17-CV-00656
)H.SUSAN.COX
PLAINTIFF)J.A.WOOD

V.

DEFENDANT

DR.KELTON
VALLEY HOSPITAL
CHRIST HOSPITAL
GATZA R.
M.MANICKI
MARGIS
GOEBAL
PINES
UNKNO-SHERIFFS
A.BUFFO/DENAULT
T.PS.SULLIVAN
JENNERBLOCKFIRM
CITY OF LASALLE
ET..AL.,DARCY DEPUTY

MOTION for trial by °12 jury demand opposing defendant's motion for SUMMARY JUDGMENT, IN'LIGHT OF THIS,COUPLIED, MOTION for sanctions 37(d) rule, 219 - Supreme Court rule evidence Destruction pursuant to Federal rules of civil procedure.

The PLAINTIFF,Zsoch Dunn,Pursuant Too{I'll.S.ct.R.219,},

1). Plaintiff Zsoch Dunn, maintains to this trial court particularly concerned with the defendant council's who are in default, who have failed to comply with valdes Maria Majesty judge Valdez and order more than two years ago to keep settlement demand album discussions going no matter what is the case went through and progressed which never occurred.

2) the plaintiff a j c d u n n, has out-of-pocket cost and even had a multimillion-dollar lawsuit 14 - CV - 4128 monetarily substantially hindered in India and injured and interfering obstructed as a result of the February 2nd 2016 occurrence causing a recovery to be effective, and even got robbed it had a large all of this money songs taken as it relates to this litigation matter.

3) THE plaintiff suffered rotator cuff tears with x-rays of supporting materials requiring additional surgery, Future care loss of life as a result of the incident and being face down from back words with multiple of these defendants, g a t z a, mANICKI, OFFICER mentioned in BuffO AARON the DEFENDANTS, in question call COHERSIONED at the LaSalle sheriff's jail using excessive force and battery and malicious conspiratorial methods while engaging and conversational pre-arrival at the hospital conspiratorial calls between the two of ASSUalters ,Gatza, and denault sheriff with history of batteries urged dr. Kelton on behalf of valley hospital who now change their name to in the middle of litigation to Christ hospital, a hospital the plaintiff ZDUNN was bound",and repeatedly beat with a KNIGHTSTICK', during this litigation & was sexually assaulted by police there 09/24/2017/-dr kelton a similar European doctor, upon arrival at the facility came out to the open emergency doors and followed every direction order that the police told him to do stating:

"is this the guy you guys called about "?cohersioning" you hurt,a, the cop back there"!! quote, both parties are destroyers of evidence and so scarcely destroyed the plaintiffs life.,Dr KELTON would batter and tightly squeeze Dunn's wrist,advocating on behalf of the police, sheriff's etc,"they did nothing to you "!. They didn't hurt you back there"!,he denied x-rays of SEVERALLY PURPLE,RED,N BLACKENED,ELBOW INDICATED INJURIES AND CERVIX,WRIST,BI-LATERALS, SHOULDE- ALL OVER FROM A FACEDOWN,HANDCUFFED BEATING,BY ALL NAMED COPS./ DEFENDANTS,A.BUFFO,MARGIS, DENAULT,GOEBAL,MANICKI CAUSED THAT DR,KNEW THESE OFFICERS BEFORE THEY ARRIVED WITH INJURED DUNN ,DISABLED, WHICH WAS A(CLAS- X FELONY),AS WAS LIEING ON THEIR POLICE REPORT,AND ABOUT THE CRIME SCENE.

4) the Brady VS Maryland rights and All rights OF US CITIZEN ZDUNN AGAINST(U.S.C -2000 section (A)prohibiting discrimination and entry into a facility under(1964 and under the(1864 provisions of the of the ACT) AFFORDED TO THE plaintiff Z.D. has BEEN EVISCERATED.

5)TIMELY filed correspondence

TIMELY' filed motions electronically thanks to the file ban unlawful restriction, (case dismissed with prejudice in Dunn's favor)filings USPS sent have been lost to tampering, due to failure to accommodate plaintiff,due to the abuse,sexual harrassing,at the court entry ,at the locatio,219 s Dearborn st.

6) The plaintiffs filed REPORTS vs the court and been retaliated, my filings, and the Material evidence tampering of the material, evidentiary nature of every pleading and document that I've sent has been destructive and no judge I have went in front of has only received maybe (1) or two of my TIMELY FILINGS, which is caused the plaintiff ZSOCH DUNN, substantial harm while advancing the interest of all the DEFENDANTS police officers AN LaSalle SHERIFF'S Department on behalf of the CITY of LaSalle who furnish their employers with the

means AND the instrumentality, the place and location BUILDING to where the injury was suffered AT 707 EAST ETNA ROAD THE HANDS OF LASALLE EMPLOYERS 'without authority and he's ACTS was performed on behalf of the employees to the extent where the interest of these DEFENDANTS ,GATZA, MANICKI,,A.BUFFO,(ET.AL.),even to the federal court is being advanced.

7) The plaintiff ZDUNN, filed a timely appeal door was rejected due to manifest bias, the appeal sought relief from a date of entry judgement by prejudice wood, which was stabbed October 28th 2019 by Gino CLERK, to re-enter the doctor back into the complaint to get the other COMPLAINTS, count(S) placed back into the litigation to avoid unexpected prejudicial outcome by the decision before I as plaintiff had even made it to my deposition, (INCARCERATED) Judge woods decision prejudiced even my in territorial rights a company buy new do carnations to entertain in accordance with the Supreme Court's standard a ruling in Maryland, glucksberg the deposing of the police officer S.

8) some of the comments by the judge WOODS, imply and influence, improper ability to achieve the memes to imply inappropriate collective behavior from the defendant's counsel, including bad prejudice your tactical legal advice to both parties which is over region, misleading as the honorable Judge Cox takes over the plaintiff is maturity confused.

9) Because there is evidence in this case that the LaSalle police confirmed the identity of mr. Dunn which came back clear *on the driver's license before they finally decided to force him out of the Honda Accord that was not own a registered to mr. Dunn there is evidence that the police did run or could have run a check on his Michigan place before deciding to stop the vehicle and the reasonable Jury would had decided that there was no objective, unreasonable, suspicion or probable cause to pull over the vehicle. the vehicle was not stolen the pace the police new that the plates were valid and that the plaintiff was not speeding.

10) the Plaintiff ask this honorable judge Susan Cox for leaves correct error in a particular area on the grounds for the motion the responsibility professionally to comply with the rules of professional misconduct and blocking for over a hundred fifty days for non-criminal reasons access to enter the court building against the plaintiff who has been injured and a very lengthy orders that illustrate Constitutional improper influence against the plaintiff mr . Dunn, VICTIM,.

11) THE DEFENDANTS had never moved (after service of summons us 25 FORMS the US Marshal service and SERVICE of the complainT, the litigation compliance from the plaintiff the injured party with third-party interest rights to Medicare owed under USC 1395 section,{that will be calculated off of the self calculative portal and put together by the plaintiff who knows the medical cost for the treatment and the financial bills that have been incurred for the injury salt in the mental anguish he can prove care that he received at various locations for two years plus as it relates to this incident)

12)The DEFENDANTS,c/o of their officers, GATZA, BuffO, MARGIS, DENAULT, GOEBAL sheriff's, LaSalle,DR.KELTON,RECORDS TAMPERER, NEGLIGENCE IN XRAY DENIALS,AND INJURYING DUNN.

13) THEY never even COMPLIED with rule 37 a regarding Discovery,DEPOSITION, QUESTIONING WAS A SHAM)when the plaintiff was represented by inefficient abandoned CouSEL,MAHER,T.P.S.,, to the present date ,multiple Court appearances the attorneys as associates professionals with an acquired shareholders Representatives, fiduciary, associate ARRANGEMENTS EVEN DURING PERIODS HE ABUSED THE PLAINTIFF,Jenner & block with the judge shared some kind of desire to unjustly delay and Post PONE and say they have other trials going on and obligations against the interest off the plaintiff which is virtually AVERRING,their position as to whether or not the LaSalle police in the LaSalle SHERIFFS who injured the plaintiff ZD,have a final say-so in deciding whether to accept or reject an offer of settlement and it whether to the plea in THE case ITS not up to the attorneys OF RECORD.

14) in light of(USA VS beckstead,10 TH CIRCUIT) USPS,mail was sent too the LaSalle courts,judges,state,etc,jail,police,by Dunn,and(Ed Johnson third)to preserve the evidence,as to valley hospital and on calls , to,keep All footages,elements of assessing bad-faith,' pre- TRIAL,MOTIONS, for summary judgements, WHICH MUST I PRAY BE DENIED.

15) determination should be deferred until trial against the defendants collectively, have relief' only be granted to the Plaintiff zdunn because the defendants have engaged in spoliation of evidence which the jury will be given adverse instructions against the DEFENDANTS,all police officers,sheriff's.

16) DEFENDANTS answers,by counsel who materially offer,tender ,nothing,are frivolous summarise ,'untimely,and fatal beyond two years of service of summons by Marshalls ,by where plaintiff,did not do waiver of service .

17(plaintiff's suffered severe injuries,mental attachable,proovable damages of mental anguish,and economic injury,Medicare owed damages suffered by ZDUNN,who continually suffers from the unlawful warrantless",sweep" arrest where,Dr KELTON,LaSalle named deputies and police were acting under color of law,by a action of destroying a viscous battery assault,that Even valley hospital a hospital Dunn preferred not to go to,labelled assaulted by police ,enabled indifferences,to the Constitutional rights of a natural person herein (" Zsoch Dunn)

18) Plaintiff has not previously dismissed any federal or state court suits regarding the same claims as those presented in this case

Proof of service

I, Zsoch Dunn, on February 14th 2020 do swear declare that on this date Saturday and close motion for leave to proceed in form of pauperis on every other person's required to be served this appeal to the federal 219 s Dearborn st Court deposited in a USPS envelope that contained documents attachments, USPS mail property address in each of them with postage prepaid to deliver within 3 days To the Illinois unincorp Chicago building, Illinois, 60604, 60601

I declare under penalty of perjury that the foregoing is true and correct executed on February 2nd 2020 signature

Order

This matter coming to be heard on the motion to objectively, humbly to reconsider and vacate the denials of all motions and motion for a trial without payment to appeal as a matter of right side with the Illinois supreme court February 14th 2020 by USPS or served on all parties, the Brian gainer Kevin CaseyCourt, being revised and dummy for on premise semicolon it is hereby ordered that the motion to proceed pauperis is

Allowed/ granted/ denied.....

Presiding justice H S.Cox

Justice

Justice

Date: 2/7/2020- Zsoch Dunn

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FEB 25 2020 *P6*

2-25-20

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

MR: Z DUNN
7627 S. Sangamonst
Chicago, IL 60620
1818

To: US District Court

219 S Dearborn St.

CHICAGO, ILLINOIS, 60604

ATTN: Judge: SUSAN COX - Magistrate
20th Floor

FOREVER
USA

Barn Swallow



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2020 FEB 25 AM 8:29



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